



April 28, 2016

Via ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

The first phase of the USF Order released on March 30, 2016 is to allow companies that may elect to take Model-Based support to file challenges about competitive overlap identified by the FCC. The FCC obtained their information from the June 30, 2015 FCC Form 477 filings. These challenges along with the appropriate documentation need to be filed by April 28, 2016.

This challenge is for Preston Telephone Company, SAC 351276. The competitors identified in the ACAM model are: Bernard Communications Company, Inc., Bernard Telephone Company Inc. and Central Scott Telephone Company, Inc. The impacted census blocks, reasons for challenge and supporting evidence have been included with this filing.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,
/s/ James Becker

James P. Becker
Cost Consultant

cc: Katie King, via email (Katie.King@fcc.gov)

FCC Docket 10-90
Competitive Overlap Challenge
Preston Telephone Company

Filing Entity Preston Telephone Company
SAC 351276

Census Block Digit FIPS Code	State	Competitor Name As Listed	Reason for Challenge	Type of Supporting Evidence	Reference
Preston Telephone Iowa 190979503002122 Iowa	Iowa	Central Scott Telephone Company, Inc.	No voice offering, no broadband offering, subsidized carrier	Statement from Central Scott Telephone Company, Inc.	Attachment #1
190979502003118 Iowa	Iowa	Benard Telephone Company Inc.	No voice offering, no broadband offering, subsidized carrier	Statement from Barnard Telephone Company Inc.	Attachment #2
190979502003131 Iowa	Iowa	Benard Telephone Company Inc.	No voice offering, no broadband offering, subsidized carrier	Statement from Barnard Telephone Company Inc.	Attachment #2
190979502003165 Iowa	Iowa	Benard Telephone Company Inc.	No voice offering, no broadband offering, subsidized carrier	Statement from Barnard Telephone Company Inc.	Attachment #2
190979503002127 Iowa	Iowa	Benard Telephone Company Inc.	No voice offering, no broadband offering, subsidized carrier	Statement from Barnard Telephone Company Inc.	Attachment #2
190979502003118 Iowa	Iowa	Benard Communications Company Inc.	No broadband offering	Statement from Bernard Communications Company, Inc.	Attachment #3
190979502003131 Iowa	Iowa	Benard Communications Company Inc.	No broadband offering	Statement from Bernard Communications Company, Inc.	Attachment #3
190979502003165 Iowa	Iowa	Benard Communications Company Inc.	No broadband offering	Statement from Bernard Communications Company, Inc.	Attachment #3
190979503002127 Iowa	Iowa	Benard Communications Company Inc.	No broadband offering	Statement from Bernard Communications Company, Inc.	Attachment #3

Preston Telephone Company
351276

DECLARATION OF COMPANY REPRESENTATIVE NAME

I, *Kent A. Dau*, am the CFO of *Central Scott Telephone Company, Inc.* I have personal and direct knowledge of the representations made by Preston Telephone Company in its April 27, 2016 Comments to the Federal Communications Commission, Docket No. 10-90 regarding the Company's service area and competitive overlap. Based upon my personal and direct knowledge, I verify the truth and accuracy of the information contained herein. I verify that *Central Scott Telephone Company, Inc.* does not provide broadband service and voice service as an unsubsidized competitor in Preston Telephone Company's incumbent telephone service area Census Blocks, including:

190979503002122

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 27, 2016

A handwritten signature in black ink, appearing to read "Kent A. Dau", is written over a horizontal line.

Kent A. Dau

CFO

Central Scott Telephone Company, Inc.

FRN: 0003-7221-21

DECLARATION OF KYLE MANDERS

I, Kyle Manders, am General Manager of Bernard Telephone Company Inc. or the "Company". I have personal and direct knowledge of the representations made by Preston Telephone Company in its April 27, 2016 Comments to the Federal Communications Commission, Docket No. 10-90 regarding the Company's service area and competitive overlap. Based upon my personal and direct knowledge, I verify the truth and accuracy of the information contained herein. I verify that Bernard Telephone Company does not provide broadband service as an unsubsidized competitor in Preston Telephone Company's incumbent telephone service area Census Blocks, including:

190979502003118

190979502003131

190979502003165

190979503002127

Executed on April 27, 2016

A handwritten signature in black ink, appearing to read "Kyle Manders", is written over a horizontal line.

Kyle Manders, General Manager
Bernard Telephone Company Inc.

DECLARATION OF KYLE MANDERS

I, Kyle Manders, am General Manager of Bernard Communications Company Inc. or the "Company". I have personal and direct knowledge of the representations made by Preston Telephone Company in its April 27, 2016 Comments to the Federal Communications Commission, Docket No. 10-90 regarding the Company's service area and competitive overlap. Based upon my personal and direct knowledge, I verify the truth and accuracy of the information contained herein. I verify that Bernard Communications Company does not provide broadband service as an unsubsidized competitor in Preston Telephone Company's incumbent telephone service area Census Blocks, including:

190979502003118

190979502003131

190979502003165

190979503002127

Executed on April 27, 2016

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Kyle Manders, General Manager
Bernard Communications Company Inc.